



**Air Quality
TIER II OPERATING PERMIT
and
PERMIT TO CONSTRUCT**

**State of Idaho
Department of Environmental Quality**

PERMIT No.: T2-050033

FACILITY ID No.: 027-00060

AQCR: 64

CLASS: SM80

SIC: 2431

ZONE: 11

UTM COORDINATE (km): 532.9, 4827.8

1. PERMITTEE

Woodgrain Millwork, Inc. – Nampa Facility

2. PROJECT

Tier II Operating Permit Renewal and Incorporation of Permit to Construct Conditions

3. MAILING ADDRESS

P.O. Box 9489

CITY

Nampa

STATE

ID

ZIP

83652

4. FACILITY CONTACT

Greg Wood

TITLE

QA Manager

TELEPHONE

(208) 467-5221

5. RESPONSIBLE OFFICIAL

Mike Kemp

TITLE

General Manager

TELEPHONE

(208) 467-5221

6. EXACT PLANT LOCATION

1201 West Karcher Road, Nampa, Idaho

COUNTY

Canyon

7. GENERAL NATURE OF BUSINESS & KINDS OF PRODUCTS

Wood Doors and Millwork

8. PERMIT AUTHORITY

This permit to construct and Tier II operating permit is issued according to the Rules for the Control of Air Pollution in Idaho, IDAPA 58.01.01.200-228 and IDAPA 58.01.01.400-470, respectively. This permit pertains only to emissions of air contaminants, which are regulated by the state of Idaho and to the sources specifically allowed to be operated by this permit.

Only the terms and conditions pertaining to Tier II operating permit requirements are subject to the expiration date of this permit.

The permit to construct conditions in this permit will expire if construction has not begun within two years of its issue date or if construction is suspended for one year.

This permit has been granted on the basis of design information presented in the application and the Idaho Department of Environmental Quality's (DEQ) technical analysis of the supplied information. Changes in design or equipment that result in any change in the nature or amount of emissions may be considered a modification. Modifications are subject to DEQ review in accordance with IDAPA 58.01.01.200 of the Rules for the Control of Air Pollution in Idaho.

TONI HARDESTY, DIRECTOR
DEPARTMENT OF ENVIRONMENTAL QUALITY

Date Issued:

Public Comment

Date Modified/Revised:

Date Expires:

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Acronyms, Units., and Chemical Nomenclatures

AFS	AIRS Facility Subsystem
AIRS	Aerometric Information Retrieval System
AQCR	Air Quality Control Region
CAA	Clean Air Act
CFR	Code of Federal Regulations
CO	carbon monoxide
DEQ	Department of Environmental Quality
dscf	dry standard cubic feet
EPA	U.S. Environmental Protection Agency
hp	horsepower
IDAPA	a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
km	kilometer
lb/hr	pound per hour
MMBtu	million British thermal units
PM	particulate matter
PM ₁₀	particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers
PTC	permit to construct
SIC	Standard Industrial Classification
SIP	State Implementation Plan
SM	synthetic minor
SO ₂	sulfur dioxide
SO _x	sulfur oxides
T/yr	tons per year
UTM	Universal Transverse Mercator
VOC	volatile organic compound

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			Date Modified/Amended	
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1. TIER II OPERATING PERMIT SCOPE

Purpose

1.1 The purpose for this Tier II operating permit and permit to construct is the following:

- Renewal of the facility's existing operating permit, Tier II Operating Permit No. T2-000052, issued June 27, 2000
- Incorporation of Permit to Construct No. P-040036, issued April 15, 2005

1.2 This Tier II operating permit and permit to construct replaces the following permits, the terms and conditions of which shall no longer apply:

- Tier II Operating Permit No. 027-00060, issued December 27, 1996
- Modification to Tier II Operating Permit No. 027-00060, issued September 25, 1998
- Permit to Construct No. 027-00060, issued January 19, 1999
- Tier II Operating Permit No. T2-000052, issued June 27, 2000
- Permit to Construct No. P-040036, issued April 15, 2005

Regulated Sources

1.3 Table 1.1 lists all sources of regulated emissions in this permit.

Table 1.1 SUMMARY OF REGULATED SOURCES

Permit Section	Source Description	Emissions Control(s)
3	Veneer Dryer	None
4	Water-Borne Prime Line With AES Infrared Drying System	2 Interlocked Filters

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2. FACILITY-WIDE CONDITIONS

Fugitive Emissions

- 2.1 All reasonable precautions shall be taken to prevent PM from becoming airborne in accordance with IDAPA 58.01.01.650-651. In determining what is reasonable, considerations will be given to factors such as the proximity of dust-emitting operations to human habitations and/or activities and atmospheric conditions that might affect the movement of particulate matter. Some of the reasonable precautions include, but are not limited to, the following:
- Use, where practical, of water or chemicals for control of dust in the demolition of existing buildings or structures, construction operations, the grading of roads, or the clearing of lands.
 - Application, where practical, of asphalt, oil, water, or suitable chemicals to, or covering of, dirt roads, material stockpiles, and other surfaces which can create dust.
 - Installation and use, where practical, of hoods, fans, and fabric filters or equivalent systems to enclose and vent the handling of dusty materials. Adequate containment methods should be employed during sandblasting or other operations.
 - Covering, where practical, of open-bodied trucks transporting materials likely to give rise to airborne dusts.
 - Paving of roadways and their maintenance in a clean condition, where practical.
 - Prompt removal of earth or other stored material from streets, where practical.
- 2.2 The permittee shall monitor and maintain records of the frequency and the method(s) used (i.e., water, chemical dust suppressants, etc.) to reasonably control fugitive emissions.
- 2.3 The permittee shall maintain records of all fugitive dust complaints received. The permittee shall take appropriate corrective action as expeditiously as practicable after receipt of a valid complaint. The records shall include, at a minimum, the date that each complaint was received and a description of the following: the complaint, the permittee's assessment of the validity of the complaint, any corrective action taken, and the date the corrective action was taken.
- 2.4 The permittee shall conduct a quarterly facility-wide inspection of potential sources of fugitive emissions, during daylight hours and under normal operating conditions to ensure that the methods used to reasonably control fugitive emissions are effective. If fugitive emissions are not being reasonably controlled, the permittee shall take corrective action as expeditiously as practicable. The permittee shall maintain records of the results of each fugitive emissions inspection. The records shall include, at a minimum, the date of each inspection and a description of the following: the permittee's assessment of the conditions existing at the time fugitive emissions were present (if observed), any corrective action taken in response to the fugitive emissions, and the date the corrective action was taken.

Odors

- 2.5 The permittee shall not allow, suffer, cause, or permit the emission of odorous gases, liquids, or solids to the atmosphere in such quantities as to cause air pollution.

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- 2.6 The permittee shall maintain records of all odor complaints received. If the complaint has merit, the permittee shall take appropriate corrective action as expeditiously as practicable. The records shall include, at a minimum, the date that each complaint was received and a description of the following: the complaint, the permittee's assessment of the validity of the complaint, any corrective action taken, and the date the corrective action was taken.

Visible Emissions

- 2.7 The permittee shall not discharge any air pollutant to the atmosphere from any point of emission for a period or periods aggregating more than three minutes in any 60-minute period which is greater than 20% opacity as determined by procedures contained in IDAPA 58.01.01.625. These provisions shall not apply when the presence of uncombined water, NO_x, and/or chlorine gas is the only reason for the failure of the emission to comply with the requirements of this section.
- 2.8 The permittee shall conduct a quarterly facility-wide inspection of potential sources of visible emissions, during daylight hours and under normal operating conditions. The visible emissions inspection shall consist of a see/no see evaluation for each potential source. If any visible emissions are present from any point of emission, the permittee shall either take appropriate corrective action as expeditiously as practicable, or perform a Method 9 opacity test in accordance with the procedures outlined in IDAPA 58.01.01.625. A minimum of 30 observations shall be recorded when conducting the opacity test. If opacity is greater than 20% for a period or periods aggregating more than three minutes in any 60-minute period, the permittee shall take all necessary corrective action and report the exceedance in accordance with IDAPA 58.01.01.130-136. The permittee shall maintain records of the results of each visible emissions inspection and each opacity test when conducted. The records shall include, at a minimum, the date and results of each inspection and test and a description of the following: the permittee's assessment of the conditions existing at the time visible emissions are present (if observed), any corrective action taken in response to the visible emissions, and the date corrective action was taken.

Excess Emissions

- 2.9 The permittee shall comply with the procedures and requirements of IDAPA 58.01.01.130-136 for excess emissions due to startup, shutdown, scheduled maintenance, safety measures, upsets and breakdowns.

Open Burning

- 2.10 The permittee shall comply with the requirements of the Rules for Control of Open Burning, IDAPA 58.01.01.600-616.

Performance Testing

- 2.11 If performance testing (air emissions source test) is required by this permit, the permittee shall provide notice of intent to test to DEQ at least 15 days prior to the scheduled test date or shorter time period as approved by DEQ. DEQ may, at its option, have an observer present at any emissions tests conducted on a source. DEQ requests that such testing not be performed on weekends or state holidays.

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All performance testing shall be conducted in accordance with the procedures in IDAPA 58.01.01.157. Without prior DEQ approval, any alternative testing is conducted solely at the permittee's risk. If the permittee fails to obtain prior written approval by DEQ for any testing deviations, DEQ may determine that the testing does not satisfy the testing requirements. Therefore, at least 30 days prior to conducting any performance test, the permittee is encouraged to submit a performance test protocol to DEQ for approval. The written protocol shall include a description of the test method(s) to be used, an explanation of any or unusual circumstances regarding the proposed test, and the proposed test schedule for conducting and reporting the test.

Within 30 days following the date in which a performance test required by this permit is concluded, the permittee shall submit to DEQ a performance test report. The written report shall include a description of the process, identification of the test method(s) used, equipment used, all process operating data collected during the test period, and test results, as well as raw test data and associated documentation, including any approved test protocol.

Monitoring and Recordkeeping

- 2.12 The permittee shall maintain sufficient records to ensure compliance with all of the terms and conditions of this operating permit. Records of monitoring information shall include, but not be limited to the following: (a) the date, place, and times of sampling or measurements; (b) the date analyses were performed; (c) the company or entity that performed the analyses; (d) the analytical techniques or methods used; (e) the results of such analyses; and (f) the operating conditions existing at the time of sampling or measurement. All monitoring records and support information shall be retained for a period of at least five years from the date of the monitoring sample, measurement, report, or application. Supporting information includes, but is not limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation and copies of all reports required by this permit. All records required to be maintained by this permit shall be made available in either hard copy or electronic format to DEQ representatives upon request.

Reports and Certifications

- 2.13 Any reporting required by this permit, including, but not limited to, records, monitoring data, supporting information, requests for confidential treatment, notifications of intent to test, testing reports, or compliance certifications, shall contain a certification by a responsible official. The certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document(s) are true, accurate, and complete. Any reporting required by this permit shall be submitted to the following address:

Air Quality Permit Compliance
Department of Environmental Quality
Air Quality Manager
Boise Regional Office
1445 N. Orchard
Boise Idaho 83706
Phone: (208) 373-0550

Fax: (208) 373-0287

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Fuel-burning Equipment

- 2.14 The permittee shall not discharge to the atmosphere from any fuel-burning equipment PM in excess of 0.015 gr/dscf of effluent gas corrected to 3% oxygen by volume for gas, 0.050 gr/dscf of effluent gas corrected to a 3% oxygen by volume for liquid, 0.050 gr/dscf of effluent gas corrected to 8% oxygen by volume for coal, and 0.080 gr/dscf of effluent gas corrected to 8% oxygen by volume for wood products.

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3. WOOD PROCESSING AND HANDLING**3.1 Process Description**

This emission unit consists of the wood processing and handling operations for the following manufacturing areas at the Nampa facility: Prefinish, Millwork, Optimization, and Storage. Wood processing consists of cutting, moulding, shaping, and joining of wood. Wood processing operations also include the hammer hog processing of scrap materials. Wood handling operations consist of the transfer of sawdust and shavings by pneumatic conveyance and drop transfers.

**Table 3.1 WOOD PROCESSING AND
HANDLING DESCRIPTION**

Emissions Sources / Processes	Emissions Point
Cyclone #1	Cyclone #1 Stack
Cyclone #2	Cyclone #2 Stack
Cyclone #3	Cyclone #3 Stack
Cyclone #4	Cyclone #4 Stack
Cyclone #5	Cyclone #5 Stack
Cyclone #7	Cyclone #7 Stack
Baghouse #4	Baghouse #4 Stack
Baghouse #3	Baghouse #3 Stack
Baghouse #1	Baghouse #1 Stack
Baghouse #2	Baghouse #2 Stack

Emissions Limits**3.2. Process Weight Rate**

The permittee shall not discharge to the atmosphere from any source operating prior to October 1, 1979, PM in excess of the amount shown by the following equations, where E is the allowable emissions from the entire source in pounds per hour, and PW is the process weight in pounds per hour:

- If PW is less than 17,000 lb/hr,
 $E = 0.045(PW)^{0.6}$
- If PW is equal to or greater than 17,000 lb/hr,
 $E = 1.12(PW)^{0.27}$

Operating Requirements**3.3 General Compliance Requirements**

At all times when operating, the permittee shall operate the emission sources listed in Table 3.1 in accordance with the O&M specifications specified in Permit Condition 3.5.

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3.4 Operations and Maintenance Manual Requirements

Within 60 days after issuance of this permit, the permittee shall have developed an O&M specifications for the emission sources listed in Table 3.1 which describes the procedures that will be followed to comply with General Provision 2 and the air pollution control device requirements contained in this permit. The specifications shall remain onsite at all times and made available to DEQ representatives upon request.

[PTC Condition]

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4. VENEER DRYER

4.1 Process Description

The veneer dryer is a 1 MMBtu/hr drying unit that dries veneer for the door manufacturing process.

4.2 Emission Control Description

Emissions from the veneer dryer are uncontrolled.

Emissions Limits

4.3 PM₁₀ Emission Limits

The PM₁₀ emissions from the veneer dryer stack shall not exceed any corresponding emissions rate limits listed in Table 4.1.

Table 4.1 VENEER DRYER EMISSIONS LIMITS

Source Description	PM ₁₀	
	lb/hr	T/yr
Veneer Dryer	0.5	2.1

Operating Requirements

4.4 Veneer Dryers Fuel Type

Veneer dryers shall be fired by natural gas exclusively.

4.5 Veneer Drying Process Rate

The maximum amount of veneer dried shall not exceed the capacity to produce any of the following:

- 30,000 doors per week
- 1,560,000 doors per year

Monitoring and Recordkeeping Requirements

4.6 Veneer Drying Process Rate

The number of finished door units produced which require veneer, shall be monitored and recorded on a weekly and annual basis to demonstrate compliance with Permit Condition 4.6. Records of this information shall be kept in accordance with Permit Condition 2.12.

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5. WATER-BORNE PRIME LINE WITH AES INFRARED DRYING SYSTEM

5.1 Process Description

The prime line will be used to apply water-borne primer to various substrates using an automated flat line finishing system. The process is limited by the drying capacity of the oven. Coated substrate is dried in an infrared 480,000 Btu/hr natural gas-fired oven known as the AES infrared drying system.

5.2 Emission Control Description

Overspray from the prime line is controlled by an integral filter system consists of two filters that are interlocked to the spraying system. The spraying system cannot be run without these filters in place. The filters each have a PM capture efficiency of 99%. VOC emissions are uncontrolled.

Emissions Limits

5.3 VOC Emission Limits

The VOC emissions from the prime line stack shall not exceed 77.85 tons per any consecutive 12-month period.

[PTC Condition]

Operating Requirements

5.4 Integral Filter System

Within 60 days of issuance of this permit, the permittee shall have developed an O&M manual for the integral filter system based on the manufacturer's specifications and recommendations. The permittee shall operate and maintain the integral filter system in accordance with the O&M manual. The O&M manual and manufacturer's specifications shall be kept on site and made available upon DEQ representative's request. Once developed, a copy of the O&M manual shall be submitted to DEQ in accordance with Permit Condition 2.13.

[PTC Condition]

5.5 AES Infrared System

The oven for AES infrared drying system shall be fired by natural gas exclusively.

[PTC Condition]

Monitoring and Recordkeeping Requirements

5.6 Required Coating Monitoring Information

The permittee shall monitor and record the following information for each and every coating used. Records of this information shall remain onsite for the most recent two-year period and shall be made available to DEQ representatives upon request.

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- the coating product name and manufacturer
- the coating Material Safety Data Sheet (MSDS)
- the coating density, in lb/gal
- the coating VOC content, in percent by weight; or the coating VOC content, in lb VOC/lb coating
- the coating throughput each month and each year, in gal/mo and gal/yr

[PTC Condition]

5.7 VOC Emissions Monitoring

Using the information monitored and recorded in Permit Condition 5.7, the permit shall calculate monthly and annually, the total VOC emissions to demonstrate compliance with Permit Condition 5.3. Annual emissions shall be determined by summing monthly emissions over the previous consecutive 12-month period. Records of this information shall remain onsite for the most recent two-year period and shall be made available to DEQ representatives upon request.

Each month, the permittee shall calculate the VOC emissions from the prime line using the following calculation method or DEQ approved alternative:

Monthly VOC emissions rate = $\sum G_i \times W_i \times \text{VOC}_i \text{ content}$

Annual VOC emissions rate = sum of the monthly VOC emissions rate over the previous consecutive 12-month period.

G_i : For each coating, the coating throughput for the previous month, in gal/mo

W_i : For each coating, the density of coating G_i , in lb/gal

$\text{VOC}_i \text{ content}$: For each coating, the VOC content of coating G_i , in percent by weight VOC as indicated in the MSDS provided by the coating manufacturer; or the VOC content of coating G_i , in lb VOC/lb of coating as indicated in the MSDS provided by the coating manufacturer.

[PTC Condition]

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6. TIER II OPERATING PERMIT AND PERMIT TO CONSTRUCT GENERAL PROVISIONS

1. The permittee has a continuing duty to comply with all terms and conditions of this permit. All emissions authorized herein shall be consistent with the terms and conditions of this permit and the Rules for the Control of Air Pollution in Idaho. The emissions of any pollutant in excess of the limitations specified herein, or noncompliance with any other condition or limitation contained in this permit, shall constitute a violation of this permit and the Rules for the Control of Air Pollution in Idaho, and the Environmental Protection and Health Act, Idaho Code §39-101, et seq.
2. The permittee shall at all times (except as provided in the Rules for the Control of Air Pollution in Idaho) maintain in good working order and operate as efficiently as practicable, all treatment or control facilities or systems installed or used to achieve compliance with the terms and conditions of this permit and other applicable Idaho laws for the control of air pollution.
3. The permittee shall allow the Director, and/or the authorized representative(s), upon the presentation of credentials:
 - To enter, at reasonable times, upon the premises where an emissions source is located, or in which any records are required to be kept under the terms and conditions of this permit.
 - At reasonable times, to have access to and copy any records required to be kept under the terms and conditions of this permit, to inspect any monitoring methods required in this permit, and require stack compliance testing in conformance with IDAPA 58.01.01.157 when deemed appropriate by the Director.
4. Nothing in this permit is intended to relieve or exempt the permittee from compliance with any applicable federal, state, or local law or regulation, except as specifically provided herein.
5. The permittee shall notify DEQ, in writing, of the required information for the following events within five working days after occurrence:
 - Initiation of Construction - Date
 - Completion/Cessation of Construction - Date
 - Actual Production Startup - Date
 - Initial Date of Achieving Maximum Production Rate - Production Rate and Date
6. If performance testing (air emissions source test) is required by this permit, the permittee shall provide notice of intent to test to DEQ at least 15 days prior to the scheduled test date or shorter time period as approved by DEQ. DEQ may, at its option, have an observer present at any emissions tests conducted on a source. DEQ requests that such testing not be performed on weekends or state holidays.

All performance testing shall be conducted in accordance with the procedures in IDAPA 58.01.01.157. Without prior DEQ approval, any alternative testing is conducted solely at the permittee's risk. If the permittee fails to obtain prior written approval by DEQ for any testing deviations, DEQ may determine that the testing does not satisfy the testing requirements. Therefore, at least 30 days prior to conducting any performance test, the permittee is encouraged to submit a performance test protocol to DEQ for

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approval. The written protocol shall include a description of the test method(s) to be used, an explanation of any or unusual circumstances regarding the proposed test, and the proposed test schedule for conducting and reporting the test.

Within 30 days following the date in which a performance test required by this permit is concluded, the permittee shall submit to DEQ a performance test report. The written report shall include a description of the process, identification of the test method(s) used, equipment used, all process operating data collected during the test period, and test results, as well as raw test data and associated documentation, including any approved test protocol.

7. The provisions of this permit are severable, and if any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected thereby.
8. In accordance with IDAPA 58.01.01.123, all documents submitted to DEQ, including, but not limited to, records, monitoring data, supporting information, requests for confidential treatment, testing reports, or compliance certification shall contain a certification by a responsible official. The certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document(s) are true, accurate, and complete.